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Attorneys for Plaintiff D.L.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

A.B. and S.B., Minors, by and through
Erin K. Olson, their Conservator, and
D.L.,

Plaintiffs,

v.

ANDREW FRANKLIN KOWALCZYK,

Defendant.

Case No. 3:19-cv-1521-MO

**DECLARATION OF CAROL L. HEPBURN IN
SUPPORT OF PLAINTIFF D.L.'s RESPONSE IN
OPPOSITION TO DEFENDANT KOWALCZYK'S
MOTION TO DISMISS COMPLAINT**

MOTION TO DISMISS FILED: July 7, 2020

JUDGE: Michael W. Mosman, United States District
Judge

CAROL L. HEPBURN hereby declares the following to be true and correct under penalty
of perjury of the laws of the State of Oregon:

1. I represent the Plaintiff D.L. and make this declaration in support of her Response
in Opposition to Defendant Kowalczyk's Motion to Dismiss Complaint.

2. Attached at Ex. 1 is a true and correct copy of the Order Denying Defendant's Motion
to Dismiss in *Amy et al v. Randall Steven Curtis*, USDC No. 19-cv-2184-PJH, 2019 WL 4141926.

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DECLARATION OF CAROL L. HEPBURN IN SUPPORT OF
PLAINTIFF D.L.'s RESPONSE IN OPPOSITION
TO DEF KOWALCZYK'S MOTION TO DISMISS THE COMPLAINT

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CAROL L. HEPBURN, P.S.

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1 Dated: July 20, 2020.

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3 CAROL L. HEPBURN, P.S.

4 By /s Carol L. Hepburn
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27 DECLARATION OF CAROL L. HEPBURN IN SUPPORT OF
28 PLAINTIFF D.L.'s RESPONSE IN OPPOSITION
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CERTIFICATE OF SERVICE

I hereby certify that I have caused to be served a true copy of the foregoing document and its supporting “Plaintiff D.L.’s Response in Opposition to Defendant’s Motion to Dismiss” on the defendant by prepaid, first-class mail, addressed as follows:

Andrew Franklin Kowalczyk, USM No. 39532-086
USP-Tucson
PO Box 24550
Tucson, AZ 85734

Dated: July 20, 2020.

CAROL L. HEPBURN, P.S.

By /s Carol L. Hepburn
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